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27 UNITED STATES OF AMERICA

28 UNITED STATES DISTRICT COURT

29 FOR THE CENTRAL DISTRICT OF CALIFORNIA

30 UNITED STATES OF AMERICA,

31 No. CR 2:22-cr-00471-SPG

32 Plaintiff,

33 COOPERATION PLEA AGREEMENT FOR
34 DEFENDANT SALVADOR HUIZAR

35 v.

36 SALVADOR HUIZAR,

37 Defendant.

38 1. This constitutes the plea agreement between SALVADOR HUIZAR
39 ("defendant") and the United States Attorney's Office for the Central
40 District of California ("the USAO") in the above-captioned case.
41 This agreement is limited to the USAO and cannot bind any other
42

1 federal, state, local, or foreign prosecuting, enforcement,
2 administrative, or regulatory authorities.

3 DEFENDANT'S OBLIGATIONS

4 2. Defendant agrees to:

5 a. Give up the right to indictment by a grand jury and,
6 at the earliest opportunity requested by the USAO and provided by the
7 Court, appear and plead guilty to a single-count information in the
8 form attached to this agreement as Exhibit 1 or a substantially
9 similar form, which charges defendant with False Statements to a
10 Federal Agency, in violation of Title 18, United States Code, Section
11 1001(a)(2).

12 b. Not contest the Factual Basis agreed to in this
13 agreement.

14 c. Abide by all agreements regarding sentencing contained
15 in this agreement.

16 d. Appear for all court appearances, surrender as ordered
17 for service of sentence, obey all conditions of any bond, and obey
18 any other ongoing court order in this matter.

19 e. Not commit any crime; however, offenses that would be
20 excluded for sentencing purposes under United States Sentencing
21 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not
22 within the scope of this agreement.

23 f. Be truthful at all times with the United States
24 Probation and Pretrial Services Office and the Court.

25 g. Pay the applicable special assessment at or before the
26 time of sentencing unless defendant has demonstrated a lack of
27 ability to pay such assessment.

28

3. Defendant further agrees to cooperate fully with the USAO, the Federal Bureau of Investigation ("FBI"), and, as directed by the USAO, any other federal, state, local, or foreign prosecuting, enforcement, administrative, or regulatory authority. This cooperation requires defendant to:

a. Respond truthfully and completely to all questions that may be put to defendant, whether in interviews, before a grand jury, or at any trial or other court proceeding.

b. Attend all meetings, grand jury sessions, trials or other proceedings at which defendant's presence is requested by the USAO or compelled by subpoena or court order.

c. Produce voluntarily all documents, records, or other tangible evidence relating to matters about which the USAO, or its designee, inquires.

4. For purposes of this agreement: (1) "Cooperation Information" shall mean any statements made, or documents, records, tangible evidence, or other information provided, by defendant pursuant to defendant's cooperation under this agreement; and (2) "Plea Information" shall mean any statements made by defendant, under oath, at the guilty plea hearing and the agreed to factual basis statement in this agreement.

THE USAO'S OBLIGATIONS

5. The USAO agrees to:

a. Not contest the Factual Basis agreed to in this agreement.

b. Abide by all agreements regarding sentencing contained in this agreement.

1 c. At the time of sentencing, provided that defendant
2 demonstrates an acceptance of responsibility for the offenses up to
3 and including the time of sentencing, recommend a two-level reduction
4 in the applicable Sentencing Guidelines offense level, pursuant to
5 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an
6 additional one-level reduction if available under that section.

7 6. The USAO further agrees:

8 a. Not to offer as evidence in its case-in-chief in the
9 above-captioned case or any other criminal prosecution that may be
10 brought against defendant by the USAO, or in connection with any
11 sentencing proceeding in any criminal case that may be brought
12 against defendant by the USAO, any Cooperation Information.
13 Defendant agrees, however, that the USAO may use both Cooperation
14 Information and Plea Information: (1) to obtain and pursue leads to
15 other evidence, which evidence may be used for any purpose, including
16 any criminal prosecution of defendant; (2) to cross-examine defendant
17 should defendant testify, or to rebut any evidence offered, or
18 argument or representation made, by defendant, defendant's counsel,
19 or a witness called by defendant in any trial, sentencing hearing, or
20 other court proceeding; and (3) in any criminal prosecution of
21 defendant for false statement, obstruction of justice, or perjury.

22 b. Not to use Cooperation Information against defendant
23 at sentencing for the purpose of determining the applicable guideline
24 range, including the appropriateness of an upward departure, or the
25 sentence to be imposed, and to recommend to the Court that
26 Cooperation Information not be used in determining the applicable
27 guideline range or the sentence to be imposed. Defendant
28 understands, however, that Cooperation Information will be disclosed

1 to the United States Probation and Pretrial Services Office and the
2 Court, and that the Court may use Cooperation Information for the
3 purposes set forth in U.S.S.G. § 1B1.8(b) and for determining the
4 sentence to be imposed.

5 c. In connection with defendant's sentencing, to bring to
6 the Court's attention the nature and extent of defendant's
7 cooperation.

8 d. If the USAO determines, in its exclusive judgment,
9 that defendant has both complied with defendant's obligations under
10 paragraphs 2 and 3 above and provided substantial assistance to law
11 enforcement in the prosecution or investigation of another
12 ("substantial assistance"), to move the Court pursuant to U.S.S.G.
13 § 5K1.1 to fix an offense level and corresponding guideline range
14 below that otherwise dictated by the sentencing guidelines, and to
15 recommend a term of imprisonment within this reduced range.

16 DEFENDANT'S UNDERSTANDINGS REGARDING COOPERATION

17 7. Defendant understands the following:

18 a. Any knowingly false or misleading statement by
19 defendant will subject defendant to prosecution for false statement,
20 obstruction of justice, and perjury and will constitute a breach by
21 defendant of this agreement.

22 b. Nothing in this agreement requires the USAO or any
23 other prosecuting, enforcement, administrative, or regulatory
24 authority to accept any cooperation or assistance that defendant may
25 offer, or to use it in any particular way.

26 c. Defendant cannot withdraw defendant's guilty plea if
27 the USAO does not make a motion pursuant to U.S.S.G. § 5K1.1 for a
28 reduced guideline range or if the USAO makes such a motion and the

Court does not grant it or if the Court grants such a USAO motion but elects to sentence above the reduced range.

d. At this time the USAO makes no agreement or representation as to whether any cooperation that defendant has provided or intends to provide constitutes or will constitute substantial assistance. The decision whether defendant has provided substantial assistance will rest solely within the exclusive judgment of the USAO.

e. The USAO's determination whether defendant has provided substantial assistance will not depend in any way on whether the government prevails at any trial or court hearing in which defendant testifies or in which the government otherwise presents information resulting from defendant's cooperation. That is, whether any other person, after trial, is found guilty or not guilty of any offense will have no effect on the government's sentencing recommendation for defendant.

NATURE OF THE OFFENSE

8. Defendant understands that for defendant to be guilty of the sole count of the Information, that is, false statements to a federal agency, in violation of Title 18, United States Code, Section 1001(a)(2), the following must be true: (1) defendant made a false statement; (2) the statement was made in a matter within the jurisdiction of the USAO and FBI; (3) defendant acted willfully; that is, the defendant acted deliberately and with knowledge both that the statement was untrue and that his conduct was unlawful; and (4) the statement was material to the activities or decisions of USAO or FBI; that is, it had a natural tendency to influence, or was capable of influencing, the agency's decisions or activities.

PENALTIES

9. Defendant understands that the statutory maximum sentence that the Court can impose for a violation of Title 18, United States Code, Section 1001(a)(2), is: 5 years of imprisonment; a 3-year period of supervised release; a fine of \$250,000 or twice the gross gain or gross loss resulting from the offense, whichever is greatest; and a mandatory special assessment of \$100.

10. Defendant understands that supervised release is a period of time following imprisonment during which defendant will be subject to various restrictions and requirements. Defendant understands that if defendant violates one or more of the conditions of any supervised release imposed, defendant may be returned to prison for all or part of the term of supervised release authorized by statute for the offense that resulted in the term of supervised release, which could result in defendant serving a total term of imprisonment greater than the statutory maximum stated above.

11. Defendant understands that, by pleading guilty, defendant may be giving up valuable government benefits and valuable civic rights, such as the right to vote, the right to possess a firearm, the right to hold office, and the right to serve on a jury.

Defendant understands that he is pleading guilty to a felony and that it is a federal crime for a convicted felon to possess a firearm or ammunition. Defendant understands that the conviction in this case may also subject defendant to various other collateral consequences, including but not limited to revocation of probation, parole, or supervised release in another case and suspension or revocation of a professional license. Defendant understands that unanticipated

collateral consequences will not serve as grounds to withdraw defendant's guilty plea.

3 12. Defendant understands that, if defendant is not a United
4 States citizen, the felony conviction in this case may subject
5 defendant to: removal, also known as deportation, which may, under
6 some circumstances, be mandatory; denial of citizenship; and denial
7 of admission to the United States in the future. The Court cannot,
8 and defendant's attorney also may not be able to, advise defendant
9 fully regarding the immigration consequences of the felony conviction
10 in this case. Defendant understands that unexpected immigration
11 consequences will not serve as grounds to withdraw defendant's guilty
12 plea.

FACTUAL BASIS

13. Defendant admits that defendant is, in fact, guilty of the
offense to which defendant is agreeing to plead guilty. Defendant
and the USAO agree to the statement of facts provided below and agree
that this statement of facts is sufficient to support a plea of
guilty to the charge described in this agreement and to establish the
Sentencing Guidelines factors set forth below but is not meant to be
a complete recitation of all facts relevant to the underlying
criminal conduct or all facts known to either party that relate to
that conduct.

The Federal Investigation

24 At all relevant times, the FBI and the USAO were conducting a
25 federal criminal investigation into public corruption throughout the
26 City of Los Angeles (the "City") related to multiple suspected "pay-
27 to-play" bribery schemes (the "Federal Investigation"), a matter
28 within the jurisdiction of the executive branch of the government of

1 the United States, namely, the FBI and the USAO. The Federal
2 Investigation was investigating multiple City officials, including
3 defendant's brother, Jose Huizar, then-Councilmember for Council
4 District 14 in Los Angeles, for soliciting and accepting bribes as
5 part of the "pay-to-play" scheme, including in the form of large
6 amounts of cash, and for money laundering related to the cash bribes,
7 among other things.

8 Between at least November 26, 2013, and August 22, 2018, upon
9 Jose Huizar's request, defendant accepted envelopes of cash from Jose
10 Huizar on at least 20 occasions. In exchange, defendant
11 contemporaneously wrote checks, or facilitated electronic payments
12 from defendant's own bank account, to either Jose Huizar directly or
13 to pay Jose Huizar's expenses in the same amounts as the cash
14 provided by Jose Huizar. On multiple occasions, defendant asked Jose
15 Huizar where the cash came from, and Jose Huizar told defendant it
16 was better that defendant did not know the source of the cash.

17 **False Statements in November 17, 2018 FBI Interview**

18 On or about November 17, 2018, defendant was interviewed by the
19 FBI regarding the Federal Investigation. During the recorded
20 interview, after being advised it was a crime to lie to the federal
21 government, defendant knowingly and willfully made the following
22 materially false statements to the FBI:

23 Defendant falsely stated that Jose Huizar never asked defendant
24 to write any checks on Jose Huizar's behalf except for a check to
25 assist Jose Huizar in obtaining a lawyer and another blank check to
26 an unidentified payee. Defendant also falsely stated that Jose
27 Huizar never paid defendant back for those two checks and never gave
28 defendant any money. In fact, as defendant then knew, on at least 20

1 occasions, Jose Huizar gave defendant an envelope of cash and asked
2 defendant to write checks or facilitate electronic payments to Jose
3 Huizar or for his expenses.

4 **False Statements in January 30, 2020 FBI and USAO Interview**

5 On or about January 30, 2020, defendant, with counsel present,
6 was interviewed by the FBI and the USAO regarding the Federal
7 Investigation. During the recorded interview, after being advised it
8 was a crime to lie to the federal government, defendant knowingly and
9 willfully made the following materially false statements to the FBI
10 and the USAO:

11 Defendant falsely stated that Jose Huizar gave cash to defendant
12 only because Jose Huizar owed defendant that sum of money and that
13 Jose Huizar only gave defendant cash on a later unspecified date
14 after defendant first gave Jose Huizar a check. In fact, as
15 defendant then knew, Jose Huizar already had the cash for defendant
16 and would give it to defendant at the same time defendant provided
17 the check.

18 **False Statements in March 5, 2020 Grand Jury Testimony**

19 On or about March 5, 2020, defendant, with counsel available,
20 appeared before a federal grand jury to give testimony under oath
21 regarding the Federal Investigation. During his sworn testimony,
22 after being advised that the failure to testify truthfully would
23 subject him to the penalties of perjury and false declaration before
24 a grand jury, defendant knowingly and willfully made the following
25 materially false statements to the grand jury:

26 Defendant falsely stated that Jose Huizar gave cash to defendant
27 only because Jose Huizar owed defendant that sum of money and that
28 Jose Huizar only gave defendant cash on a later unspecified date

1 after defendant first gave Jose Huizar a check. In fact, as
2 defendant then knew, Jose Huizar already had the cash for defendant
3 and would give it to defendant at the same time defendant provided
4 the check.

5 **False Statements in September 27, 2022 FBI and USAO Interview**

6 On or about September 27, 2022, defendant, with counsel present,
7 was interviewed by the FBI and the USAO regarding the Federal
8 Investigation. During the interview, after being advised it was a
9 crime to lie to the federal government, defendant knowingly and
10 willfully made the following materially false statements to the FBI
11 and the USAO:

12 Defendant falsely stated that Jose Huizar gave cash to defendant
13 only because Jose Huizar owed defendant that sum of money and that
14 Jose Huizar only gave defendant cash on a later unspecified date
15 after defendant first gave Jose Huizar a check. In fact, as
16 defendant then knew, Jose Huizar already had the cash for defendant
17 and would give it to defendant at the same time defendant provided
18 the check.

19 During this interview, upon further questioning by the USAO
20 about the accuracy of his statements regarding the timing of the cash
21 transactions with Jose Huizar, defendant later admitted that, in
22 fact, Jose Huizar regularly had the cash in his possession and gave
23 it to defendant at the same time defendant provided the checks and
24 that Jose Huizar did not owe defendant any sum of money at the time
25 of these cash-for-check transactions.

26 **SENTENCING FACTORS**

27 14. Defendant understands that in determining defendant's
28 sentence the Court is required to calculate the applicable Sentencing

1 Guidelines range and to consider that range, possible departures
2 under the Sentencing Guidelines, and the other sentencing factors set
3 forth in 18 U.S.C. § 3553(a). Defendant understands that the
4 Sentencing Guidelines are advisory only, that defendant cannot have
5 any expectation of receiving a sentence within the calculated
6 Sentencing Guidelines range, and that after considering the
7 Sentencing Guidelines and the other § 3553(a) factors, the Court will
8 be free to exercise its discretion to impose any sentence it finds
9 appropriate up to the maximum set by statute for the crime of
10 conviction.

11 15. Defendant and the USAO agree to the following applicable
12 Sentencing Guidelines factors:

13 Base Offense Level: 6 U.S.S.G. § 2B1.1

14 Obstruction of Justice +2 U.S.S.G. § 3C1.1

15 Defendant and the USAO reserve the right to argue that additional
16 specific offense characteristics, adjustments, and departures under
17 the Sentencing Guidelines are appropriate.

18 16. Defendant understands that there is no agreement as to
19 defendant's criminal history or criminal history category.

20 17. Defendant and the USAO reserve the right to argue for a
21 sentence outside the sentencing range established by the Sentencing
22 Guidelines based on the factors set forth in 18 U.S.C. § 3553(a)(1),
23 (a)(2), (a)(3), (a)(6), and (a)(7).

24 WAIVER OF CONSTITUTIONAL RIGHTS

25 18. Defendant understands that by pleading guilty, defendant
26 gives up the following rights:

27 a. The right to persist in a plea of not guilty.

28 b. The right to a speedy and public trial by jury.

c. The right to be represented by counsel - and if necessary have the Court appoint counsel - at trial. Defendant understands, however, that, defendant retains the right to be represented by counsel - and if necessary have the Court appoint counsel - at every other stage of the proceeding.

d. The right to be presumed innocent and to have the burden of proof placed on the government to prove defendant guilty beyond a reasonable doubt.

e. The right to confront and cross-examine witnesses against defendant.

f. The right to testify and to present evidence in opposition to the charges, including the right to compel the attendance of witnesses to testify.

g. The right not to be compelled to testify, and, if defendant chose not to testify or present evidence, to have that choice not be used against defendant.

h. Any and all rights to pursue any affirmative defenses, Fourth Amendment or Fifth Amendment claims, and other pretrial motions that have been filed or could be filed.

WAIVER OF APPEAL OF CONVICTION

19. Defendant understands that, with the exception of an appeal based on a claim that defendant's guilty plea was involuntary, by pleading guilty defendant is waiving and giving up any right to appeal defendant's conviction on the offense to which defendant is pleading guilty. Defendant understands that this waiver includes, but is not limited to, arguments that the statute to which defendant is pleading guilty is unconstitutional, and any and all claims that

1 the statement of facts provided herein is insufficient to support
2 defendant's plea of guilty.

3 LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE

4 20. Defendant agrees that, provided the Court imposes a total
5 term of imprisonment of no more than 6 months, defendant gives up the
6 right to appeal all of the following: (a) the procedures and
7 calculations used to determine and impose any portion of the
8 sentence; (b) the term of imprisonment imposed by the Court; (c) the
9 fine imposed by the Court, provided it is within the statutory
10 maximum; (d) to the extent permitted by law, the constitutionality or
11 legality of defendant's sentence, provided it is within the statutory
12 maximum; (e) the term of probation or supervised release imposed by
13 the Court, provided it is within the statutory maximum; and (g) any
14 of the following conditions of probation or supervised release
15 imposed by the Court: the conditions set forth in General Order 20-04
16 of this Court; the drug testing conditions mandated by 18 U.S.C.
17 §§ 3563(a)(5) and 3583(d).

18 21. The USAO agrees that, provided all portions of the sentence
19 are at or below the statutory maximum specified above, the USAO gives
20 up its right to appeal any portion of the sentence.

21 RESULT OF WITHDRAWAL OF GUILTY PLEA

22 22. Defendant agrees that if, after entering a guilty plea
23 pursuant to this agreement, defendant seeks to withdraw and succeeds
24 in withdrawing defendant's guilty plea on any basis other than a
25 claim and finding that entry into this plea agreement was
26 involuntary, then (a) the USAO will be relieved of all of its
27 obligations under this agreement, including in particular its
28 obligations regarding the use of Cooperation Information; (b) in any

1 investigation, criminal prosecution, or civil, administrative, or
2 regulatory action, defendant agrees that any Cooperation Information
3 and any evidence derived from any Cooperation Information shall be
4 admissible against defendant, and defendant will not assert, and
5 hereby waives and gives up, any claim under the United States
6 Constitution, any statute, or any federal rule, that any Cooperation
7 Information or any evidence derived from any Cooperation Information
8 should be suppressed or is inadmissible.

9 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

10 23. Defendant agrees that if the count of conviction is
11 vacated, reversed, or set aside, both the USAO and defendant will be
12 released from all their obligations under this agreement.

13 EFFECTIVE DATE OF AGREEMENT

14 24. This agreement is effective upon signature and execution of
15 all required certifications by defendant, defendant's counsel, and an
16 Assistant United States Attorney.

17 BREACH OF AGREEMENT

18 25. Defendant agrees that if defendant, at any time after the
19 signature of this agreement and execution of all required
20 certifications by defendant, defendant's counsel, and an Assistant
21 United States Attorney, knowingly violates or fails to perform any of
22 defendant's obligations under this agreement ("a breach"), the USAO
23 may declare this agreement breached. For example, if defendant
24 knowingly, in an interview, before a grand jury, or at trial, falsely
25 accuses another person of criminal conduct or falsely minimizes
defendant's own role, or the role of another, in criminal conduct,
defendant will have breached this agreement. All of defendant's
obligations are material, a single breach of this agreement is

1 sufficient for the USAO to declare a breach, and defendant shall not
2 be deemed to have cured a breach without the express agreement of the
3 USAO in writing. If the USAO declares this agreement breached, and
4 the Court finds such a breach to have occurred, then:

5 a. If defendant has previously entered a guilty plea
6 pursuant to this agreement, defendant will not be able to withdraw
7 the guilty plea.

8 b. The USAO will be relieved of all its obligations under
9 this agreement; in particular, the USAO: (i) will no longer be bound
10 by any agreements concerning sentencing and will be free to seek any
11 sentence up to the statutory maximum for the crime to which defendant
12 has pleaded guilty; and (iii) will no longer be bound by any
13 agreement regarding the use of Cooperation Information and will be
14 free to use any Cooperation Information in any way in any
15 investigation, criminal prosecution, or civil, administrative, or
16 regulatory action.

17 c. The USAO will be free to criminally prosecute
18 defendant for false statement, obstruction of justice, and perjury
19 based on any knowingly false or misleading statement by defendant.

20 d. In any investigation, criminal prosecution, or civil,
21 administrative, or regulatory action: (i) defendant will not assert,
22 and hereby waives and gives up, any claim that any Cooperation
23 Information was obtained in violation of the Fifth Amendment
24 privilege against compelled self-incrimination; and (ii) defendant
25 agrees that any Cooperation Information and any Plea Information, as
26 well as any evidence derived from any Cooperation Information or any
27 Plea Information, shall be admissible against defendant, and
28 defendant will not assert, and hereby waives and gives up, any claim

1 under the United States Constitution, any statute, Rule 410 of the
2 Federal Rules of Evidence, Rule 11(f) of the Federal Rules of
3 Criminal Procedure, or any other federal rule, that any Cooperation
4 Information, any Plea Information, or any evidence derived from any
5 Cooperation Information or any Plea Information should be suppressed
6 or is inadmissible.

7 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

8 OFFICE NOT PARTIES

9 26. Defendant understands that the Court and the United States
10 Probation and Pretrial Services Office are not parties to this
11 agreement and need not accept any of the USAO's sentencing
12 recommendations or the parties' agreements to facts or sentencing
13 factors.

14 27. Defendant understands that both defendant and the USAO are
15 free to: (a) supplement the facts by supplying relevant information
16 to the United States Probation and Pretrial Services Office and the
17 Court, (b) correct any and all factual misstatements relating to the
18 Court's Sentencing Guidelines calculations and determination of
19 sentence, and (c) argue on appeal and collateral review that the
20 Court's Sentencing Guidelines calculations and the sentence it
21 chooses to impose are not error, although each party agrees to
22 maintain its view that the calculations in paragraph 15 are
23 consistent with the facts of this case. This paragraph permits both
24 the USAO and defendant to submit full and complete factual
25 information to the United States Probation and Pretrial Services
26 Office and the Court, even if that factual information may be viewed
27 as inconsistent with the Factual Basis agreed to in this agreement.

1 28. Defendant understands that even if the Court ignores any
2 sentencing recommendation, finds facts or reaches conclusions
3 different from those agreed to, and/or imposes any sentence up to the
4 maximum established by statute, defendant cannot, for that reason,
5 withdraw defendant's guilty plea, and defendant will remain bound to
6 fulfill all defendant's obligations under this agreement. Defendant
7 understands that no one -- not the prosecutor, defendant's attorney,
8 or the Court -- can make a binding prediction or promise regarding
9 the sentence defendant will receive, except that it will be within
10 the statutory maximum.

NO ADDITIONAL AGREEMENTS

12 29. Defendant understands that, except as set forth herein,
13 there are no promises, understandings, or agreements between the USAO
14 and defendant or defendant's attorney, and that no additional
15 promise, understanding, or agreement may be entered into unless in a
16 writing signed by all parties or on the record in court.

17 //

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

30. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED

UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
SUSAN S. HAR
J. JAMARI BUXTON
PATRICK CASTAÑEDA
Assistant United States Attorneys

10/10/2022

Date _____

SALVADOR HUIZAR
Defendant

10-10-22

Date _____

ED ROBINSON
Attorney for Defendant
SALVADOR HUIZAR

Oct 10, 2022

Date _____

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charge and wish to take advantage of the promises set forth in this agreement, and not for any other reason.

SALVADOR HUIZAF
Defendant

10-10-22

Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

2 I am SALVADOR HUIZAR'S attorney. I have carefully and
3 thoroughly discussed every part of this agreement with my client.
4 Further, I have fully advised my client of his rights, of possible
5 pretrial motions that might be filed, of possible defenses that might
6 be asserted either prior to or at trial, of the sentencing factors
7 set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines
8 provisions, and of the consequences of entering into this agreement.
9 To my knowledge: no promises, inducements, or representations of any
10 kind have been made to my client other than those contained in this
11 agreement; no one has threatened or forced my client in any way to
12 enter into this agreement; my client's decision to enter into this
13 agreement is an informed and voluntary one; and the factual basis set
14 forth in this agreement is sufficient to support my client's entry of
15 a guilty plea pursuant to this agreement.


ED ROBINSON
Attorney for Defendant
SALVADOR HUIZAR

October 10, 2022
Date

EXHIBIT 1

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CR No.

Plaintiff,

I N F O R M A T I O N

v.

[18 U.S.C. § 1001(a)(2): Making
False Statements]

SALVADOR HUIZAR,

Defendant.

The United States Attorney charges:

[18 U.S.C. § 1001(a)(2)]

At times relevant to this Information:

A. THE FEDERAL INVESTIGATION

1. The Federal Bureau of Investigation ("FBI") and the United States Attorney's Office ("USAO") were conducting a federal criminal investigation into public corruption throughout the City of Los Angeles (the "City") related to multiple suspected "pay-to-play" bribery schemes (the "Federal Investigation"), a matter within the jurisdiction of the executive branch of the government of the United States, namely, the FBI and the USAO. The Federal Investigation was investigating multiple City officials, including defendant SALVADOR HUIZAR's brother, Jose Huizar, then-Councilmember for Council

EXHIBIT 1

1 District 14 in Los Angeles, for soliciting and accepting bribes as
2 part of the "pay-to-play" scheme, including in the form of large
3 amounts of cash, and for money laundering related to the cash bribes,
4 among other things.

5 2. Between at least November 26, 2013, and August 22, 2018,
6 upon Jose Huizar's request, defendant SALVADOR HUIZAR accepted
7 envelopes of cash from Jose Huizar on at least 20 occasions. In
8 exchange, defendant SALVADOR HUIZAR contemporaneously wrote checks,
9 or facilitated electronic payments from defendant SALVADOR HUIZAR's
10 own bank account, to either Jose Huizar directly or to pay Jose
11 Huizar's expenses in the same amounts as the cash provided by Jose
12 Huizar. On multiple occasions, defendant SALVADOR HUIZAR asked Jose
13 Huizar where the cash came from, and Jose Huizar told defendant
14 SALVADOR HUIZAR it was better that defendant SALVADOR HUIZAR did not
15 know the source of the cash.

16 B. FALSE STATEMENTS IN JANUARY 30, 2020 FBI AND USAO INTERVIEW

17 3. On or about January 30, 2020, in Los Angeles County, within
18 the Central District of California, in a matter within the
19 jurisdiction of the executive branch of the government of the United
20 States, namely, the FBI and USAO, defendant SALVADOR HUIZAR knowingly
21 and willfully made materially false statements and representations to
22 the FBI and USAO knowing that these statements and representations
23 were untrue. Specifically, on multiple occasions, defendant SALVADOR
24 HUIZAR stated that Jose Huizar gave cash to defendant SALVADOR HUIZAR
25 only because Jose Huizar owed defendant SALVADOR HUIZAR that sum of
26 money and that Jose Huizar only gave defendant SALVADOR HUIZAR cash
27 on a later unspecified date after defendant SALVADOR HUIZAR first
28 gave Jose Huizar a check. In fact, as defendant SALVADOR HUIZAR then

EXHIBIT 1

1 knew, Jose Huizar already had the cash for defendant SALVADOR HUIZAR
2 and would give it to defendant SALVADOR HUIZAR at the same time
3 defendant SALVADOR HUIZAR provided the check.

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6

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